

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	CASE No. 19-24636-GLT
)	
Jerome D. Boyd)	Chapter 13
Debtor)	
)	Related to Doc. No.: 169
Jerome D. Boyd)	
Movant)	
)	
v.)	
)	
Nationstar Mortgage LLC d/b/a Mr. Cooper)	
Respondent)	

SUPPLEMENT

AND NOW come the Debtor Jerome D. Boyd, by and through his Attorney, Albert G. Reese, Jr., and files the following Supplement reaffirming his decision to convert his Chapter 13 case to a Chapter 7 proceeding:

1. Jerome D. Boyd (hereinafter “Plaintiff”), filed an emergency voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on November 29, 2019.
2. The Debtor’s completed Petition, Schedules and Plan were filed December 13, 2019.
3. The Debtor’s Motion Imposing the Automatic Stay was granted on December 16, 2019.
4. On November 18, 2024, the Chapter 13 Trustee filed a Motion to Dismiss at Docket No. 162.
5. On December 5, 2024 the Debtor filed a Response regarding the hearing at Docket No. 164.
6. On January 3, 2025 the hearing was scheduled for January 8, 2025, and was subsequently rescheduled to January 29, 2025 at Docket No. 165.
7. On January 27, 2025 the Debtor filed a Notice of Conversion from Chapter 13 to Chapter 7 First Time – Never Previously a 7 at Docket No. 167.
8. On January 29, 2025, the hearing was held regarding the Trustee’s Motion to Dismiss. The trustee’s Motion to Dismiss was then continued to February 12, 2025 at Docket No. 168.
9. The Courts allowed the Debtor additional time to see if he can complete his Chapter 13 plan as currently

scheduled.

10. Counsel had a conversation with the Debtor and explained his options. The Debtor advised that he could not complete his Chapter 13 plan in the next 90 days. As a result, the Debtor would like to convert his case to one under Chapter 7 so he can eliminate his unsecured debt and start fresh in a new Chapter 13 plan.

WHEREFORE, the Plaintiff files this Supplemental Status Report pursuant to text order at Docket No. 169.

Dated: February 5, 2025

Respectfully submitted by:
/s/ Albert G. Reese, Jr. Esq.
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